

Elizabeth Osoria

From: Brown, Nancy A <BrownN@SEC.GOV>
Sent: Friday, July 12, 2019 4:30 PM
To: MELISSA MACKIEWICZ; DENNIS RICHARD
Cc: Bromberg, Katherine; Daniels, Jon
Subject: RE: SEC v Honig, et al. - Hard Drive with SEC's Responsive Documents

Melissa,

We will endeavor to get you an index.

However, the production was produced with information that allows you to sort the production by various fields, including producing party, production date, bates number, etc., and is fully searchable, so I'm not clear on what problems you're having reviewing the documents. You will recall that I represented that the vast majority of the documents (more than 569,000 documents) are those culled from the hard drive provided to us by Wiley Livingston. If you are finding those documents irrelevant, you can filter them out, significantly reducing the number of documents in the production.

Where are you on your production? We've heard nothing further from you since we received the phone records you produced on July 3, 2019. As you know, we agreed to limit, for now, our request to the three issuers named in the Complaint, and did so on the understanding that that would speed your production. You represented that that review and production was well underway over a week ago.

Please let us know when we can expect your production of documents relating to the three issuers.

Thank you.

From: MELISSA MACKIEWICZ <Melissa@richardandrichard.com>
Sent: Friday, July 12, 2019 4:07 PM
To: Brown, Nancy A <BrownN@SEC.GOV>
Cc: DENNIS RICHARD <dennis@richardandrichard.com>; Randall Lee <randall.lee@cooley.com>; Chris Johnstone <chris.johnstone@wilmerhale.com>
Subject: SEC v Honig, et al. - Hard Drive with SEC's Responsive Documents

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Nancy:

We have received our hard drive of the SEC's initial document production and the two CDs enclosed with your July 8, 2019 letter to Randall Lee, counsel for Defendant Ladd, that contain additional documents.

We have been able to discern that the 1-TB hard drive contains more than 4.2 million pages of bates labeled documents. Although the hard drive may be searchable – as you represented to Judge Ramos – we have found the search capability to be extremely limited. It is not useful as we attempt to review and make sense of this overwhelming document production. No doubt, as Judge Ramos

inquired, the SEC has an index of this massive digital document production. Please provide this index to us as soon as possible.

Thank you. Melissa

Melissa L. Mackiewicz, Esq.

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